

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC. )  
Plaintiff )  
v. ) Case No. PJM 08 cv 0921  
WORLD AVENUE USA, LLC, et al. )  
Defendants )  
\_\_\_\_\_)

**WORLD AVENUE USA, LLC'S AMENDED MOTION FOR EXTENSION  
OF TIME TO COMPLY WITH COURT ORDER**

Defendant World Avenue USA, LLC. (“WAUSA”) and its counsel, move this Honorable Court for an extension of time to comply with the Court’s Order (DE 428), and as grounds therefore states as follows:

1. On September 23, 2010, this Court ordered both parties to supplement all discovery, and to certify all discovery responses as complete and accurate. DE 428. The time to respond was extended to October 14, 2010. DE 434.

2. Due to the prolixity of the discovery materials propounded by Plaintiff Beyond Systems, Inc. (“BSI”), Defendant WAUSA must review the accuracy of over a hundred pages of discovery responses as well as certify that thousands of pages are compliant with the discovery responses. Unlike BSI, WAUSA does not routinely engage in litigating these matters, and must respond to each request on a case-by-case basis. WAUSA is in the process of supplementing its documents and discovery responses, but does require additional time to certify that such responses are complete, or to produce additional discovery.

3. Further, counsel for Defendant WAUSA have the following conflicts which preclude immediate compliance with the Court's ruling:

a. Counsel Sanford M. Saunders, Jr. will be travelling to and in Russia from the evening of October 18, 2010 until Saturday, October 23, 2010;

b. The undersigned is scheduled for trial before the Honorable Harold Baer, in the United States District, Southern District of New York; in the case of *Settlement Funding, LLC v. AXA Equitable Life Insurance Company*; Case No.: 09-CV-8685(HB), commencing October 18, 2010 through at least October 22, 2010; and.

c. Co-counsel Nicoleta Burlacu is presently out of the country on her honeymoon returning on Monday, October 25, 2010.

4. Accordingly, WAUSA and its counsel request an extension of time until Tuesday, October 26, 2010 to complete their obligations.

5. Counsel for WAUSA has requested the extension from BSI, but counsel for BSI has refused to give the extension.

**WHEREFORE**, Defendant WAUSA respectfully requests the Court grant an extension of time to Tuesday, October 26, 2010 to supplement all discovery, and to certify all discovery responses as complete and accurate as ordered by this Court on September 23, 2010. (DE 428).

Respectfully submitted,  
*Attorneys for World Avenue USA, LLC*

/s/John L. McManus

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